

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF GEORGIA - ATLANTA DIVISION**

IN RE:	* CASE NO. 18-60978-jwc
	*
Steven Anthony Crawford,	*
DBA S-A-C Trucking, LLC,	*
and	* CHAPTER 13
Camille Elizabeth Crawford,	*
	*
	*
	*
Debtors	*

**MOTION TO EXCUSE DEFAULT IN PAYMENTS
TO CHAPTER 13 TRUSTEE AND FOR A MATCHING REDUCTION IN PLAN BASE**

COME NOW Debtors, through counsel, and file this *Motion to Excuse Default in Payments to Chapter 13 Trustee and for a Matching Reduction in Plan Base*, showing to this Honorable Court the following:

1.

Debtors filed a Petition constituting an Order For Relief under Title 11 U.S.C. Chapter 13 on July 2, 2018.

2.

Debtors' Chapter 13 Plan was confirmed on October 23, 2018.

3.

Debtors' plan calls for payments to the Trustee of \$3,340.00 per month.

4.

Debtors have defaulted in the payments under the confirmed plan.

5.

Debtor had to replace a tank on his work vehicle and was out of work due to this. He also had an income decrease due to COVID19.

6.

Debtors respectfully request that the Court excuse the default in plan payments for the months of January, February and March 2020, inclusive. Debtors shall resume making the plan

payments in April 2020, at which time Debtors shall modify the plan and schedules to cure any term problem that might exist.

7.

Debtors further request that the Plan base be reduced by the amount equal to the default being excused. Debtors show that this reduction does not cause a reduction in the percentage or pool of funds provided to general, unsecured creditors in the Plan.

WHEREFORE, Debtors pray that this *Motion to Excuse Default in Payments to Chapter 13 Trustee and for a Matching Reduction in Plan Base* be granted.

Respectfully submitted,

/s/
Jessica Douglas GA Bar No. 340570
Attorney for Debtors

Clark & Washington, LLC
3300 Northeast Expressway
Building 3
Atlanta GA 30341
Phone: 404-522-2222
Fax: 770-220-0685
Email: ecfnotices@cw13.com

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and	* CHAPTER 13
Camille Elizabeth Crawford,	*
	*
	*
Debtors	*

**NOTICE OF HEARING ON MOTION TO EXCUSE DEFAULT IN PAYMENTS
TO CHAPTER 13 TRUSTEE AND FOR A MATCHING REDUCTION IN PLAN BASE**

PLEASE TAKE NOTICE that Debtors filed a *Motion to Excuse Default in Payments to Chapter 13 Trustee and for a Matching Reduction in Plan Base* seeking (a) to have a default in Debtors' plan payments excused, and (b) a corresponding reduction in the plan base.

PLEASE TAKE FURTHER NOTICE that the Court will hold a hearing on the matter in Courtroom 1203 of the US Courthouse, 75 Ted Turner Drive, SW, Atlanta, GA, 30303, at 10:00AM, on May 19, 2020.

Your rights may be affected by the court's ruling on these pleadings. You should read these pleadings carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.) If you do not want the court to grant the relief sought in these pleadings or if you want the court to consider your views, then you and/or your attorney must attend the hearing. You may also file a written response to the pleading with the Clerk at the address stated below, but you are not required to do so. If you file a written response, you must attach a certificate stating when, how and on whom (including addresses) you served the response. Mail or deliver your response so that it is received by the Clerk at least two business days before the hearing. The address of the Clerk's Office is Clerk, U.

S. Bankruptcy Court, Suite 1340, 75 Ted Turner Drive, Atlanta Georgia 30303. You must also mail a copy of your response to the undersigned at the address stated below.

Respectfully submitted,

/s/

Jessica Douglas GA Bar No. 340570
Attorney for Debtors

Clark & Washington, LLC
3300 Northeast Expressway
Building 3
Atlanta GA 30341
Phone: 404-522-2222
Fax: 770-220-0685
Email: ecfnotices@cw13.com

CERTIFICATE OF SERVICE

I certify that I served Debtors with a true and correct copy of the within the and foregoing *Motion to Excuse Default in Payments to Chapter 13 Trustee and for a Matching Reduction in Plan Base* and *Notice of Hearing on Motion to Excuse Default in Payments to Chapter 13 Trustee and for a Matching Reduction in Plan Base* by placing the same in the United States Mail with adequate postage affixed to ensure delivery and addressed as follows:

Steven Anthony Crawford
Camille Elizabeth Crawford
1040 Meadows Springs Drive SW
Conyers GA 30094

And, in the same manner, I served the parties listed in the attached matrix at the addresses indicated therein.

I further certify that Nancy J Whaley, the Standing Chapter 13 Trustee, was served via the CM/ECF electronic mail/noticing system.

DATE: 04/24/2020

/s/

Jessica Douglas GA Bar No. 340570
Attorney for Debtors

Clark & Washington, LLC
3300 Northeast Expressway
Building 3
Atlanta GA 30341
Phone: 404-522-2222
Fax: 770-220-0685
Email: ecfnotices@cw13.com

Label Matrix for local noticing
113E-1
Case 18-60978-jwc
Northern District of Georgia
Atlanta
Fri Apr 24 09:53:59 EDT 2020

American Express National Bank
c/o Becket and Lee LLP
PO Box 3001
Malvern PA 19355-0701

(P)AMERICAN HONDA FINANCE
P O BOX 168088
IRVING TX 75016-8088

Amex
Correspondence/Bankruptcy
Po Box 981540
El Paso, TX 79998-1540

Julie M. Anania
Nancy J. Whaley
Standing Chapter 13 Trustee
Suite 120
303 Peachtree Center Avenue
Atlanta, GA 30303-1286

Avant Credit, Inc
Attention Bankruptcy
Po Box 9183380
Chicago, IL 60691-3380

BANK OF AMERICA, N.A.
PO BOX 31785
TAMPA, FL 33631-3785

Bank of America
Attn: Bankruptcy Nc4-105-02-77
Po Box 26012
Greensboro, NC 27420-6012

Carolee Berasi
Stern & Eisenberg
1709 Devonshire Drive
Columbia, SC 29204-2404

(p)JPMORGAN CHASE BANK N A
BANKRUPTCY MAIL INTAKE TEAM
700 KANSAS LANE FLOOR 01
MONROE LA 71203-4774

Chase Mortgage
10790 Rancho Bernardo Rd
San Diego, CA 92127-5705

Citibank, N.A.
701 East 60th Street North
Sioux Falls, SD 57104-0493

Citibank/Sears
Centralized Bankruptcy
Po Box 790034
St Louis, MO 63179-0034

Citicards
Citicorp Credit Services/Attn: Centraliz
Po Box 790040
Saint Louis, MO 63179-0040

Citicards Cbna
Citi Bank
Po Box 6077
Sioux Falls, SD 57117-6077

E. L. Clark
Clark & Washington, LLC
Bldg. 3
3300 Northeast Expwy.
Atlanta, GA 30341-3932

Collectron Of Atlanta/Carter-Young
Attention: Bankruptcy
Po Box 92269
Atlanta, GA 30314-0269

Camille Elizabeth Crawford
1040 Meadows Springs Drive SW
Conyers, GA 30094-5768

Steven Anthony Crawford
1040 Meadows Springs Drive SW
Conyers, GA 30094-5768

Department of the Treasury
Internal Revenue Service
P.O. Box 7346
Philadelphia PA 19101-7346

Abbey Ulsh Dreher
Barrett Daffin Frappier Turner Engel LLP
Suite 100
4004 Belt Line Road
Addison, TX 75001-4320

ENGs
1 Pierce Place
Ste 1100 West
Itasca, IL 60143-3149

Engs Commercial Finance Co.
c/o Chad J. Hammons, Esq.
Jones Walker LLP
190 E. Capitol St., Ste. 800
Jackson, MS 39201-2155

(p)GEORGIA DEPARTMENT OF REVENUE
COMPLIANCE DIVISION
ARCS BANKRUPTCY
1800 CENTURY BLVD NE SUITE 9100
ATLANTA GA 30345-3202

IRS
P.O. Box 7346
Philadelphia PA 19101-7346

LVNV Funding LRC
PO Box 10587
Greenville, SC 29603-0587

Brandi R. Lesesne
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Suite 100
4004 Belt Line Road
Addison, TX 75001-4320

Mallory Velten
Brock and Scott, PLLC
Attorneys at Law
4360 Chamblee Dunwoody Rd. Suite 310
Atlanta, GA 30341-1056

NetCredit
175 W. Jackson Blvd., Suite 1000
Chicago, IL 60604-2863

New Penn Financial, LLC
c/o Shellpoint Mortgage Servicing
PO Box 10826
Greenville, SC 29603-0826

New Penn Financial, LLC d/b/a Shellpoint Mor
c/o Stern & Eisenberg Souther, PC
1709 Devonshire Drive
Columbia, SC 29204-2404

NewRez LLC d/b/a Shellpoint Mortgage Servi
NewRez LLC d/b/a Shellpoint Mortgage Ser
PO Box 10826
Greenville, SC 29603-0826

Bryce R. Noel
Aldridge Pite, LLP
3575 Piedmont Road, NE, Suite 500
Fifteen Piedmont Center
Atlanta, GA 30305-1527

PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

PayPal Credit
PO Box 105658
Atlanta, GA 30348-5658

SYNCHRONY BANK
c/o Weinstein & Riley, PS
2001 Western Ave., Ste 400
Seattle, WA 98121-3132

Shellpoint Mortgage Company
P.O. Box 51850
Livonia, MI 48151-5850

Shellpoint Mortgage Servicing
55 Beattie Place, Suite 110
Greenville, South Carolina 29601-5115

Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk, VA 23541-1021

TBF Financial, LLC
740 Waukegan Rd., Suite 404
Deerfield, IL 60015-5505

UNITED STATES DEPARTMENT OF EDUCATION
CLAIMS FILING UNIT
P O BOX 8973
MADISON, WI 53708-8973

US Department of Education/Great Lakes
Attn: Bankruptcy
Po Box 7860
Madison, WI 53707-7860

United States Attorney
Northern District of Georgia
75 Ted Turner Drive SW, Suite 600
Atlanta GA 30303-3309

Mallory Velten
Brock & Scott, PLLC
4360 Chamblee Dunwoody Road
Suite 310
Atlanta, GA 30341-1056

Nancy J. Whaley
Nancy J. Whaley, Standing Ch. 13 Trustee
303 Peachtree Center Avenue
Suite 120, Suntrust Garden Plaza
Atlanta, GA 30303-1216

The preferred mailing address (p) above has been substituted for the following entity/entities as so specified
by said entity/entities in a Notice of Address filed pursuant to 11 U.S.C. 342(f) and Fed.R.Bank.P. 2002 (g) (4).

American Honda Finance
Attn: Bankruptcy
P.O. Box 168088
Irving, TX 75016

(d)American Honda Finance Corporation
National Bankruptcy Center
P.O. Box 168088
Irving, TX 75016-8088

Chase Card Services
Correspondence Dept
Po Box 15298
Wilmington, DE 19850

Georgia Department of Revenue
Accounts Receivable Collection Section
1800 Century Blvd. NE
Suite 9100
Atlanta, GA 30345

(d)JPMorgan Chase Bank, N.A.
Chase Records Ctr Attn Correspond. Mail
Mail Code LA4-5555
700 Kansas Lane
Monroe, LA 71203

(d)JPMorgan Chase Bank, National Association
Chase Records Center Attn: Corres.
Mail Code LA4-5555
700 Kansas Lane
Monroe, LA 71203

The following recipients may be/have been bypassed for notice due to an undeliverable (u) or duplicate (d) address.

(u)BANK OF AMERICA, N.A.

(d)BANK OF AMERICA, N.A.
PO Box 31785
TAMPA, FL 33631-3785

(d)BANK OF AMERICA, N.A.
PO Box 31785
TAMPA, FL 33631-3785

(du)Bank of America, N.A.

(d)Bank of America, N.A.
PO Box 31785
Tampa, FL 33631-3785

(u)JPMorgan Chase Bank, National Association

(d)LVNV Funding LLC
PO Box 10587
Greenville, SC 29603-0587

(u)NewRez LLC dba Shellpoint Mortgage Servi

(d)Synchrony Bank
c/o PRA Receivables Management, LLC
PO Box 41021
Norfolk VA 23541-1021

End of Label Matrix
Mailable recipients 44
Bypassed recipients 9
Total 53